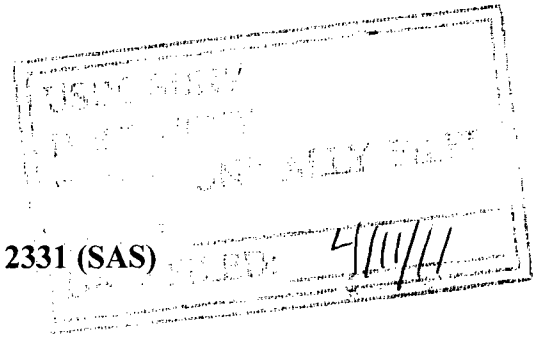


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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STOLT TANKERS BV,

11 Civ 2331 (SAS)



Petitioner,
- against -

ORDER TO SHOW CAUSE

KLABLIN S.A.; SUZANO PAPEL E
CELULOSE S.A.; ALLIANZ SEGUROS, S.A.;
and ACE SEGURADORA S.A.,

Respondents.
-----X

UPON THE MOTION of Petitioner STOLT TANKERS BV, pursuant to the Federal Arbitration Act, 9 U.S.C. §1 *et seq.*, the Declaration of Daniel Carr, Esq., dated April 4, 2011, the Declaration of Iwam Jaeger, Jr., Esq., dated April 1, 2011, and the exhibits annexed thereto, Petitioner's Memorandum of Law, and all the other pleadings and proceedings had herein,

ORDERED that Respondents KLABIN S.A.; SUZANO PAPEL E CELULOSE S.A.; ALLIANZ SEGUROS, S.A.; and ACE SEGURADORA, S.A. show cause before the Honorable Shira A. Scheindlin, United States District Judge, at 500 Pearl Street, Courtroom 15C, New York, New York, on the 16 day of April, 2011, at 2:30 ^{p.m.} ~~o'clock~~, or as soon thereafter as counsel can be heard, why an order should not be made and entered:

- (1) compelling Respondents to arbitrate their claims with Petitioner STOLT TANKERS, BV pursuant to the Charter Party, dated January 19, 2009;
- (2) directing that Respondents, within twenty (20) days of this Court's order, appoint an arbitral nominee in accordance with the requirements of the Charter Party's Arbitration Clause, failing which, Petitioner will be permitted to appoint a second arbitrator on Respondents' behalf;
- (3) enjoining Respondents KLABIN S.A., SUZANO PAPEL E CELULOSE S.A., ACE SEGURADORA S.A. and ALLIANZ SEGUROS, S.A. from continuing the legal actions they have commenced against Stolt in Brazil;

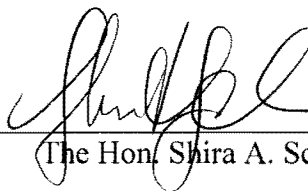
- (4) directing Respondents KLABIN S.A., SUZANO PAPEL E CELULOSE S.A., ACE SEGURADORA S.A. and ALLIANZ SEGUROS, S.A. to take all steps necessary, forthwith, to cause the pending actions in Brazil to be dismissed; and
- (5) awarding Petitioner the costs and attorneys' fees for this Petition and such other and further or different relief as the court may deem just and proper in the circumstances.

IT IS FURTHER ORDERED that service by facsimile or e-mail upon the Respondents, as set forth below, on or before 5:00 p.m. on April 13, 2011 of this Order, together with a copy of the Petition and all other papers upon which it is based be deemed good and sufficient service:

- (a) facsimile or electronic mail service upon in-house counsel for Respondent Klabin, Mrs. Maria Elisa Pacheco at: (i) 011554932758415; or (ii) mepachecho@klabin.com.br;
- (b) facsimile or electronic mail service upon in-house counsel for Respondent Suzano, Mr. Luiz Cesar Pizzotti: (i) 011 55 1135039046; or (ii) pizzotti@suzano.com.br; and
- (c) facsimile or electronic mail service upon Brazilian counsel for Respondents Ace and Allianz, Mr. Fernando Clemente: (i) 01155 1151032062; or (ii) clemente@zass-international.com.

IT IS FURTHER ORDERED that opposition papers, if any be filed and served on Petitioner's counsel, Freehill Hogan & Mahar, LLP, at their offices on or before 5:00 p.m. on April 18, 2011, and reply papers, if any, be filed and served on or before 5:00 p.m. on April 22, 2011.

Dated: New York, New York
April 11, 2011



The Hon. Shira A. Scheindlin, U.S.D.J.